

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

**MARY PHILLIPA SLEDGE, MARY JANE
PIDGEON SLEDGE TRUST, and PIDGEON SLEDGE FAMILY
LIMITED PARTNERSHIP**

Plaintiffs,

v.

Civ. 2:13-cv-2578

**INDICO SYSTEM RESOURCES, INC. and
CLEAL WATTS, III**

Defendants.

**NOTICE OF DEPOSITION OF LAWRENCE WATTS AND NOTICE OF INTENT
TO SERVE SUBPOENA DUCES TECUM ON LAWRENCE WATTS**

Pursuant to Fed. R. Civ. P. 45, you are hereby notified that on June 10, 2015, at the offices of Esquire Deposition Solutions, 1700 Pacific Ave., #1000, Dallas, Texas, 75201, at 9:00 am CST, Plaintiffs, by and through counsel, shall take the deposition of Lawrence Watts. This deposition will be taken before an officer duly authorized by law to administer oaths and will be recorded by a stenographer and/or videographer.

A copy of the cover letter from Darrell N. Phillips with Subpoena to Testify at a Deposition in a Civil Action directed to Lawrence Watts was mailed to you on April 1, 2015, as noted on the certificate of service with the subpoena. A copy of the same is also included with this Notice.

The subpoena also calls for the production of documents on or before the date of the deposition. The list of requested documents is attached to the subpoena as Exhibit A.

This 1st day of April, 2015.

Respectfully Submitted,

/s/ Darrell N. Phillips
PIETRANGELO COOK PLC
Anthony C. Pietrangelo BPR # 15596
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of April 2015, a copy of the foregoing electronically filed document was served on the parties listed below via U.S. Mail and/or email on the following parties.

Bruce A. McMullen
165 Madison Ave., Suite 2000
Memphis, Tennessee 38103

/s/ Darrell N. Phillips